

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA                   :  
   :  
                  v.                               :  
   :  
DANIEL PICCA,                               :  
   :  
                  Defendant.               :  
   : (Chief Judge Brann)

**REQUEST FOR DISCLOSURE OF EXPERT TESTIMONY**

Defendant Daniel Picca, by and through his undersigned counsel, pursuant to Rule 702, 703, and 705 of the Federal Rules of Evidence, and Rule 16(a)(1)(g) of the Federal Rules of Criminal Procedure, requests from the Government any and all information, date, interview, etc. . . upon which any individual called to testify as an "expert" on behalf of the Government has relied in forming the opinions to which he or she will testify, including a written summary of any and all testimony in which the Government intends to use in its case-in-chief.

This written summary should include, but not be limited to, a description of the opinions of any purported experts, including law enforcement officers, the bases and reasons for such opinions, and the qualifications of any such experts.

Dated:       October 31, 2022

MIELE & RYMSZA, P.C.

By:   s/ Edward J. Rymsza  
      Edward J. Rymsza, Esq.  
      Pa. I.D. No. 82911  
      Attorney for Defendant  
      125 East Third Street  
      Williamsport, PA 17701  
      (570) 322-2113  
      (570) 322-8813 (facsimile)  
      rymsza@comcast.net

**CERTIFICATE OF SERVICE**

I, Edward J. Rymsza, Esq., hereby certify that on this 31<sup>st</sup> day of October 2022, I served the foregoing Request for Expert Testimony upon Geoff MacArthur, Esq. by electronic mail.

Dated:       October 31, 2022

MIELE & RYMSZA, P.C.

By:   s/ Edward J. Rymsza  
      Edward J. Rymsza, Esq.  
      Pa. I.D. No. 82911  
      Attorney for Defendant  
      125 East Third Street  
      Williamsport, PA 17701  
      (570) 322-2113  
      (570) 322-8813 (facsimile)  
      rymsza@comcast.net